

APRIL NACE

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1 Q. And you two knew Eric Romig for how many
2 years before this incident came to light?

3 A. Two.

4 Q. And you trusted him?

5 A. Yes.

6 Q. By all appearance, you had no reason not to
7 trust him, right?

8 A. Correct.

9 Q. You thought that he was a good guy?

10 A. Yes.

11 Q. Did you think he was a good coach?

12 A. Yes, I did.

13 Q. And you thought he was respectful with the
14 girls when you saw him interact with them?

15 A. Yes.

16 Q. And you also indicated that when you first
17 learned this information, you wanted to give him the
18 benefit of the doubt?

19 A. Correct.

20 Q. Do you believe there was anything that you
21 could have done differently that would have prevented
22 this from happening?

23 A. I'd like to think so, yes.

24 Q. What would that have been?

25 A. Paying closer attention sooner.

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1 MR. RUSSELL: I have no further
2 questions. Thank you.

3 * * *

4 EXAMINATION

5 BY MS. CONNOR:

6 Q. Mrs. Nace, I just have a few questions for
7 you. I believe that your daughter testified that she
8 had issues with her weight before the Romig
9 relationship and then again after. Is that your
10 understanding?

11 A. Yes.

12 Q. But I think she testified that she never
13 sought medical treatment for the weight issues,
14 either before or after the Romig situation. Is that
15 your understanding, as well?

16 A. She didn't seek any. It was a subject that
17 was brought up when she would have her yearly
18 physicals because she was always under weight. So it
19 was something that was always brought up, you know.

20 Q. At her well visits?

21 A. Just in general. But never as a specific,
22 we know you're doing this or we know you have this
23 problem. It was just, these things occur.

24 Q. Right. Did she ever undergo any treatment
25 as a result of that?

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1 A. No.

2 Q. Okay. And it's my understanding that she

3 had some skin conditions before the Romig

4 relationship. Is that correct?

5 A. Normal acne, yes.

6 Q. Teenager acne?

7 A. Yes.

8 Q. And she also had that after the relationship

9 with Romig?

10 A. It would get worse.

11 Q. It was worse after the relationship?

12 A. Yes.

13 Q. Did she seek treatment for that after the

14 relationship?

15 A. Her pediatrician -- she didn't seek it, but

16 again at the physicals that I took her to, they made

17 note of it. They gave me a prescription. I didn't

18 fill it because I felt it was very -- from what I

19 knew of the drug, I thought the side effects were

20 worse than what would happen not taking the drug.

21 Q. Okay. Did it eventually clear up?

22 A. I think so.

23 Q. You mentioned Josh, that she's dating Josh

24 at the present time. When did she meet him?

25 A. July of this year.

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1 Q. So July of 2015?

2 A. Yes.

3 Q. And they're still dating?

4 A. Yes.

5 Q. Do you know if Liz has mentioned to Josh her
6 relationship with Eric Romig?

7 A. I do not know.

8 Q. What about Brooks, how did she meet Brooks?

9 A. He was a friend of her best friend's
10 boyfriend.

11 Q. And for how long a period of time did they
12 date?

13 A. Early this year, like February until early
14 July, late June.

15 Q. Did she ever mention to you whether she had
16 told him about her relationship with Eric Romig?

17 A. She did not.

18 MS. CONNOR: I don't have any other
19 questions. Thank you.

20 MR. SANTARONE: I don't have any
21 questions.

22 * * *

23 EXAMINATION

24 BY MR. COX:

25 Q. Mrs. Nace, my name is Rob Cox, as I

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1 mentioned earlier to your husband. I just have a few
2 questions for you.

3 To start, I'd like to have you look at
4 five documents.

5 MR. COX: David, let me hand you
6 Liz Nace's deposition transcript with the exhibits.

7 Q. Mrs. Nace, if you would, just take a look at
8 the document that's been -- that's open there in
9 front of you and it's been marked Nace 1. And I'll
10 represent to you that these are five documents that I
11 showed your daughter back in July or whenever it was
12 that we deposed her.

13 MR. GROTH: Do you need to look at
14 them? I have my copy.

15 MR. COX: Thank you.

16 BY MR. COX:

17 Q. Mrs. Nace, looking at Nace 1, this is a
18 document that your daughter identified as her grades
19 and courses for her high school career at Pennridge.
20 In other words, her transcript.

21 A. Yes.

22 Q. Does that appear to be what that is to you?
23 Do you recognize it?

24 A. Could they make it any smaller?

25 Q. Do you recognize it as her transcript from

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1 Pennridge, ma'am?

2 A. It looks to be.

3 Q. Okay. And is it your recollection that her

4 weighted grade point average was above a 4.0?

5 A. I believe so, yes.

6 Q. The next document has been marked as Nace 2.

7 And I'll represent to you that this is your

8 daughter's attendance record for her high school

9 career. Starting on the first page, references Grade

10 12. Does this document look to you to be accurate --

11 an accurate record of her attendance her senior year?

12 A. I believe she was absent -- this is her

13 senior?

14 MR. GROTH: Yes.

15 Q. This is the '14, '15 year.

16 MR. GROTH: Senior year.

17 A. I thought she had an absence in September.

18 Q. Of '14?

19 A. Yes.

20 Q. So you think there's an absence that you

21 don't see here?

22 A. I thought there was, but I don't see it on

23 here.

24 Q. Okay. You're not referring to September of

25 2013, are you, ma'am?

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- 1 A. Oh, yes, I was. Sorry.
- 2 Q. That's the next page. So, '14, '15, the
- 3 first page looks right?
- 4 A. Yes.
- 5 Q. So the next page of Nace 2 is the '13, '14
- 6 school year. And it lists, looks like three absences
- 7 in September, 12th, the 27th and the 30th?
- 8 A. Yes.
- 9 Q. And then on October 7th?
- 10 A. 1st.
- 11 Q. Yes. October 1st. Do you know what --
- 12 okay. So the 12th, 27th and the 1st. Do you know
- 13 what the bottom column refers to where it says other
- 14 absences, zero, EDCM? Do you know that means?
- 15 A. Early dismissal.
- 16 Q. And so does this look accurate to you? In
- 17 other words, the absences on the 27th and the 1st,
- 18 those are right around the time of her conversation
- 19 with you on the 26th and then the report to the
- 20 police, right?
- 21 A. Yes.
- 22 Q. Does this page look accurate to you?
- 23 A. Yes.
- 24 Q. All right. And then the third and fourth
- 25 pages are for grades -- for the '11 -- I am sorry,

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1 the '12, '13 school year and then the '11, '12 school
2 year. Do those look right to you, as well?

3 MR. GROTH: The next few pages I
4 have, they all say Grade 12.

5 MR. COX: Right. But they were
6 printed the senior year.

7 A. Yes.

8 Q. All right. And then Nace 3, I'll represent
9 to you is a record of her disciplinary history, Liz's
10 disciplinary history at Pennridge. And it reflects
11 that she didn't have any. Is that your understanding
12 of her Pennridge career, ma'am?

13 A. Yes.

14 Q. The next document that I showed your
15 daughter is marked Nace 4. And it's a copy of the
16 student handbook which was distributed to students in
17 the 2012, 2013 school year. And that would have been
18 Liz's second year in high school, 10th grade. Is
19 that right?

20 A. Yes.

21 Q. And when -- when Liz testified, she
22 confirmed that that was her signature at the bottom
23 of that cover page dated September 4th, 2012. She
24 also believed that that was your signature at the
25 bottom. Is that your signature?

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1 A. Yes, it is.

2 Q. All right. Do you remember receiving this
3 document?

4 A. Yes.

5 Q. On Page 5 of the student handbook, there's a
6 section that's titled, unlawful harassment. Do you
7 see that?

8 A. I see it.

9 Q. Did you ever have, when you received a copy
10 of this document, a conversation with Liz about the
11 handbook, about that section, about relationships
12 with teachers or coaches or anything like that?

13 A. No, I did not.

14 Q. Did you ever have a conversation at all with
15 Liz, you know, while she was a kid growing up in your
16 home about inappropriate relationships with adults or
17 teachers or coaches or anything like that?

18 A. Not directly. I am a chaperone for the
19 church, for my church. And we have had discussions
20 with some of the girls. Not over coaches, but
21 inappropriate relationships, yes.

22 Q. And when you say the girls, you mean Liz, as
23 well?

24 A. Liz was present when -- when it was
25 discussed, yes.

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1 Q. What was the nature of those conversations
2 and what was the context of it?

3 A. It was mostly internet dangers, what you
4 shouldn't do on the internet when you don't know who
5 the other party might be, so that you wouldn't hook
6 up with the wrong person, get in to trouble meeting
7 someone inappropriately.

8 Q. And what kind of -- were there examples
9 during that discussion of inappropriate relationships
10 or --

11 A. No.

12 Q. Where and when was this? If you remember.

13 A. It would have been one to two years before
14 this, on a church retreat.

15 Q. Did you ever have that kind of conversation
16 just with Liz?

17 A. No.

18 Q. The next document that you have there is
19 marked Nace 5. And it is -- it's the same document
20 that I just showed you, but for Liz's Grade 11, which
21 would have been the '13, '14 school year. Is that
22 your signature at the bottom down there?

23 A. Yes.

24 Q. Do you have any reason to believe that
25 anyone at Pennridge knew of your daughter's

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1 relationship with Eric Romig prior to his arrest on
2 October 1st?

3 A. No.

4 Q. Do you know Tom Creeden?

5 A. I know he's -- was the principal before he
6 retired. And I met with him.

7 Q. When did you meet with him?

8 A. Early October 2013, after --

9 Q. What was the context of that meeting? Was
10 it after Mr. Romig's arrest?

11 A. Yes, it was.

12 Q. Why did you meet with him?

13 A. He asked me to come in. And Mr. Babb was
14 there. So I'm not sure if it was you that was there.
15 There was a representative from the HR department, I
16 believe it was. I don't believe it was you. Forgive
17 me if I'm wrong.

18 Q. When you say you, are you referring to me?

19 A. Yourself.

20 Q. Okay. I was not there.

21 A. Okay. And the superintendent, the lady
22 superintendent, whose name I had forgotten, was
23 there.

24 Q. You're referring, I think, to Jacqueline
25 Rattigan?

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1 A. Yes.

2 Q. And the human resources director at that
3 time would have been Ray Scarpantino. Does that name
4 ring a bell at all?

5 A. I'm not sure.

6 Q. What did you discuss at that meeting with
7 those individuals?

8 A. They wanted to offer their concern of how
9 Liz was doing and make sure, or so they told me, that
10 she was doing okay. They did not have her guidance
11 counselor there, so I felt it was not -- the meeting
12 wasn't set up to be what they led me to believe it to
13 be and wasn't necessarily all after Liz's concern
14 because they didn't bring her guidance counselor and
15 didn't really -- you know, say how she was helping,
16 you know.

17 Q. Well, what was discussed at the meeting?

18 A. They asked if there was anything they could
19 do. At that time we were having problems because
20 some of Liz's teachers were demanding that she turn
21 in homework electronically -- and I don't remember
22 the name. There was a specific name. It had to be
23 sent over. And that was the only way that was
24 allowed to turn in this homework. We had no computer
25 because they had taken everything from us and myself

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1 and my husband don't have smart phones. So she had
2 no way of being able to do her homework as the
3 teacher demanded. So I asked for a laptop for her
4 from the school district.

5 And they also asked if there was anything
6 that they could have done differently.

7 Q. And what was your response to that?

8 A. I said, yes, I felt there was. I've done
9 some hiring for my own company that I work for and
10 when an employee comes in and gives you references,
11 lists previous job experience, I felt -- and I didn't
12 know how Pennridge handles theirs, but I felt that it
13 should always be -- references with past jobs should
14 always be done and not by electronic means, but at
15 least by telephone, if not in person, with the --
16 maybe they aren't close enough for you to go see the
17 person, but at least talk to them so that you could
18 get a feel if there was something --

19 Q. And do you remember when this meeting
20 occurred?

21 A. Early October.

22 Q. All right.

23 A. I believe.

24 Q. Other than your taking issue with the hiring
25 process, as you just described it, did you have any

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1 problem with how Pennridge handled this situation
2 after Mr. Romig's arrest?

3 A. No.

4 Q. What made you cross reference Eric Romig's
5 phone number when you first saw the text messages on
6 the bill?

7 A. When I saw the phone number, all I know was
8 it was familiar, that I had just seen it somewhere.
9 And when I was looking back and reading e-mails and
10 checking his e-mail -- it would have started, you
11 know, hello, my name is coach so and so, and you
12 know, practices will be on such and such a day and
13 from this time and lay out expectations, I discovered
14 that it was the same phone number.

15 Q. In the Complaint there's reference to -- I
16 believe it was Mr. Romig's sentencing hearing -- and
17 a desire among your daughter's teammates to attend
18 that hearing?

19 A. Correct.

20 Q. Did you have any problem with the way
21 Pennridge School District handled that?

22 A. In the end, no. I had been approached by a
23 mom, one of the girls who told me that her
24 daughter -- I'm not sure if she had gone to the
25 principal, if she had gone to guidance, I don't know

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1 who she told at the school, I believe it to be
2 guidance, but I'm not positive; to state that she was
3 going to go to the hearing and that several of the
4 girls were going. And they were told that they
5 weren't wanted there. And the mom immediately texted
6 to ask me if this was true. And I said it didn't
7 come from me, so I didn't know what she was talking
8 about. And she said her daughter had been told by
9 the school that I had said that I didn't want them to
10 be there. And I said, no, that was not true.

11 Q. Who is this person that you were --

12 A. The girl or the mom?

13 Q. Yes, the mom.

14 A. Lisa Bolton.

15 Q. And her daughter was a teammate of Liz's?

16 A. Yes.

17 Q. Did you speak to Mr. Creeden or Mr. Babb or
18 anyone else at the district about that?

19 A. I did not. Miss Bolton immediately after
20 her daughter texted her did speak with him. And I
21 believe she told him in no uncertain terms that it
22 was -- she would be going and her daughter would
23 also. And it was later determined, I believe, the
24 detectives possibly made a call on behalf and said
25 that if the team wanted to go, it was okay and they

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1 should be allowed to go.

2 Q. Had you requested that members of the
3 Pennridge staff keep the matter confidential?

4 A. Yes. I did want it to be as confidential as
5 possible.

6 Q. And did you understand at any time that that
7 was the basis for Mr. Creeden's concern about
8 teammates attending the hearing?

9 A. This was, I believe, the sentencing hearing.
10 It was at the end. And by that time several of the
11 teammates had been to at least two other hearings.
12 So, it may have been his intention, but it was common
13 knowledge by that time.

14 Q. Do you have any independent knowledge of a
15 conversation -- and again not anything that you've
16 learned from your attorneys -- between Mr. Babb and
17 Mr. Russell Hollenbach --

18 A. No.

19 Q. -- regarding Eric Romig?

20 A. No.

21 Q. Did you have the same issue with playing
22 time as your husband had in Liz's junior and senior
23 year?

24 A. Yes.

25 Q. Did you have -- what was your interaction

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1 like with Paul Koehler?

2 A. He asked me to keep score for him for the
3 Pennridge team. I had told him that I had all of my
4 clearances and made it clear to him that if he needed
5 someone, I was available and would help.

6 He asked for references and score keeping
7 styles, examples, before he took me on. And agreed
8 to do so. And then partly through the season, he
9 decided that he no longer wanted me to keep score for
10 him and sent me an e-mail telling me so, which I said
11 fine, thank you for the opportunity, to him and
12 stepped aside.

13 Q. Did you have any reason to believe that the
14 decrease in playing time that you -- that you allege
15 related to the Eric Romig situation?

16 A. I do not know.

17 Q. Do you know whether there was a -- what was
18 your interaction with Eric Romig like in Liz's first
19 and -- 9th and 10th grade years playing for him?

20 A. It was good.

21 Q. Where -- where and in what context did you
22 interact with him?

23 A. At softball games, practices when I'd be
24 picking her up or afterwards.

25 Q. Did you at any point suspect that the person

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1 picking your daughter up down the block was him?

2 A. No.

3 Q. After Liz's 9th grade season, was there a
4 softball banquet?

5 A. Yes.

6 Q. Did you attend that?

7 A. Yes.

8 Q. Did you interact with Eric Romig that
9 evening?

10 A. Yes.

11 Q. Did you notice anything unusual about the
12 way he and your daughter interacted at that time?

13 A. No.

14 Q. All right. Same questions for after her
15 sophomore year. Was there a banquet?

16 A. Yes, there was.

17 Q. And did you attend that?

18 A. Yes, I did.

19 Q. And was Mr. Romig there?

20 A. Yes, he was.

21 Q. And when was this?

22 A. Would have been June.

23 Q. Of 2013?

24 A. '13.

25 Q. And so at this point, do you know -- do you

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1 know when in June the banquet occurred?

2 A. It would have been the first to second week.

3 Q. Was it before or after Liz's 16th birthday,
4 do you remember that?

5 A. It would have been after. Her birthday is
6 in May.

7 Q. And so at least as far as the Complaint
8 alleges, at this point Mr. Romig was sending Liz
9 inappropriate texts. Is that correct?

10 A. I'm sorry. Would you repeat that?

11 Q. Sure. As far as I can tell from your
12 Complaint, in this time period after Liz's 16th
13 birthday in June, Romig is sending her inappropriate
14 texts, correct?

15 A. Yes.

16 Q. Did you notice anything unusual about their
17 relationship on the night of the banquet?

18 A. No.

19 Q. Did you feel as though, in general, the
20 Pennridge School District was supportive of your
21 daughter --

22 A. Yes.

23 Q. -- after the arrest?

24 A. Yes.

25 Q. Would you -- is it your belief -- is it your

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1 opinion that she had -- other than the Eric Romig
2 situation, a good experience at Pennridge?

3 A. Yes.

4 Q. Do you have any knowledge that she was ever
5 bullied or harassed by any of her peers or other
6 students or teammates?

7 A. No, I do not.

8 Q. Do you have any knowledge that she was ever
9 harassed or treated improperly by any member of the
10 staff or the teaching staff or support staff at
11 Pennridge other than Mr. Romig?

12 A. No.

13 MR. COX: Thank you. That's all I
14 have.

15 MR. KEMETHER: Nothing further.

16 MS. CONNOR: I just have one more
17 question.

18 * * *

19 EXAMINATION

20 BY MS. CONNOR:

21 Q. Mrs. Nace, did you have any suspicion before
22 September 25th of 2013 that your daughter was having
23 a relationship with Mr. Romig?

24 A. No.

25 Q. So before you looked at those bills, you had

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1 no suspicion?

2 A. Correct.

3 Q. So then why you did go to the e-mail that
4 Romig had sent --

5 A. I didn't go to it specifically. I'm sorry.
6 I was talking at the same time.

7 Q. That's okay.

8 A. I was just reading the e-mails and when I
9 saw the number, it clicked that that's what number I
10 had seen.

11 Q. So were you upset after you saw the number
12 on the phone bill so many times?

13 A. I thought it was a friend until I discovered
14 whose phone number it was.

15 Q. And it was that same day that you discovered
16 it was Eric Romig's number?

17 A. Yes.

18 MR. GROTH: I just have one or two
19 questions.

20 * * *

21 EXAMINATION

22 BY MR. GROTH:

23 Q. On the 26th -- I'm sorry, on the 25th when
24 you saw the phone bill and you saw all those numbers
25 or whatever, you told your husband that day or the

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1 next day?

2 A. Next day.

3 Q. The next day. The next day when you told
4 your husband, as of that point you had not had any
5 discussion with Liz, correct?

6 A. Yes, correct.

7 Q. You had not seen the content of a single
8 text from that number that you later identified to be
9 Mr. Romig's number and there were hundreds of pages
10 of billing with that phone number sending texts to
11 your daughter, correct?

12 A. Correct.

13 Q. And on the day that you first discussed that
14 with your husband on the 26th, you jointly decided
15 with him, having no conversation with your daughter
16 and having not seen the content of a single text from
17 Mr. Romig to your daughter, you both decided on that
18 day to go immediately to the police.

19 A. Yes.

20 Q. Is that correct?

21 A. Yes.

22 Q. And even that next day when you confronted
23 your daughter -- I'm sorry, that same night when you
24 confronted your daughter, if my understanding is
25 correct -- you tell me if it's not -- you didn't tell

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1 Liz on that day that you had already gone to the
2 police and reported these texts, these excessive
3 number of texts to the police department. Is that
4 correct?

5 A. That's correct.

6 Q. So when she told you that she had been
7 seeing him and they had a sexual relationship and
8 whatever, she still didn't know that you had gone to
9 the police. Is that correct?

10 A. Correct.

11 Q. How did she find out or when did she find
12 out that you and your husband had actually already
13 gone to the police with this?

14 A. She doesn't really -- we never really told
15 her when or that we had gone before we talked to her.
16 She knew that we told her we were going to go, but
17 we've never -- we never told her.

18 Q. But at some point she found out that you had
19 already gone to the police, correct?

20 A. I'm assuming she put two and two together.
21 But --

22 Q. You don't recall having a conversation with
23 her saying, by the way, we've already taken this
24 hundreds of pages or whatever pages you took of
25 billing for her phone to the police and asked them to

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1 investigate this?

2 A. I believe we did, but I don't know what time
3 frame.

4 Q. Okay. And you testified earlier that she
5 told you that she thought she was in love with him.
6 Is that correct?

7 A. Yes.

8 Q. And that she didn't want -- strike that.

9 Did she give you the impression from your
10 conversations, your initial conversation with her,
11 that she did not want anything bad to happen to Eric
12 Romig at that time?

13 A. That's correct.

14 Q. Would that be true that she expressed to you
15 that she didn't want anything bad to happen to Eric
16 Romig until the detectives told her that there were
17 other girls that he had done excessive texting with
18 and may have had some type of relationship, physical
19 or otherwise, with some other girls before he had a
20 relationship with her at Pennridge?

21 A. Yes.

22 Q. And did her viewpoint regarding Mr. Romig
23 and whether or not she wanted to continue a
24 relationship with him or whether or not he should go
25 to jail or anything bad happen to him, did her

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1 opinion of that change when she was given that
2 information by the detectives?

3 A. It started it. It didn't fully at first,
4 but, yes, it started it. And she eventually came to
5 understand that this wasn't normal and right.

6 Q. Do you believe that there are things that
7 went on between your daughter and Mr. Romig that she
8 still hasn't told you?

9 A. Yes.

10 Q. Was she forthcoming after Mr. Romig's
11 arrest, was she forthcoming in details about when,
12 where, how this all began and happened?

13 A. Not to us. Only to the police when they
14 would ask her, or the DA. Again, I wasn't in the
15 room, so I was not -- I would find out when I went to
16 court sitting in on the hearings.

17 Q. So the detectives interviewed your daughter
18 and she had to talk to them, correct?

19 A. Correct.

20 Q. She had to tell them the truth, correct?

21 A. Correct.

22 Q. But you weren't there, so you don't know
23 what details she told the detectives, correct?

24 A. No.

25 Q. You heard some of them when you went to

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1 hearings, arraignment hearings, bail hearings, that
2 type of things, where the district attorney's office
3 or the detectives would actually testify as to what
4 your daughter had told them, correct?

5 A. Correct.

6 Q. But up to that point, had she told you any
7 of those details?

8 A. No.

9 Q. Did she discuss any of those details with
10 you after you heard them in court?

11 A. No.

12 Q. Is it your impression that your daughter is
13 specifically trying not to discuss the details of her
14 relationship with Mr. Romig with either you or your
15 husband?

16 A. Yes. I think she's trying to spare us any
17 more emotional distress or discomfort.

18 MR. GROTH: I have no other
19 questions. Thank you.

20 * * *

21 EXAMINATION

22 BY MR. KEMETHER:

23 Q. Have you attempted to speak with your
24 daughter about the details of her relationship with
25 Eric Romig since his arrest?

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1 A. No.

2 MR. KEMETHER: That's all I have.

3 * * *

4 EXAMINATION

5 BY MR. RUSSELL:

6 Q. Just a couple of follow ups. If it's -- if
7 she doesn't -- if Liz does not want to talk about the
8 details of her relationship with Eric Romig again, do
9 you know why she wanted to file this civil lawsuit?
10 Has she told you why she wants to file it?

11 A. She didn't fully explain, no.

12 Q. Because I think in her deposition, if you
13 read that, she's concerned for you and your husband,
14 that this lawsuit is stressful on you. So I'm just
15 wondering why. But you don't know?

16 A. No.

17 Q. The other thing, when you went to the
18 police, in addition to the number of text messages,
19 you also told the police that you had other
20 suspicions, right? Such as -- she was secretive, you
21 told them that she was secretive about her cell phone
22 usage?

23 A. Yes.

24 Q. So in addition to the number of messages,
25 you coupled that with her secretiveness about her

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1 cell phone usage, correct, when you told the police?

2 A. Just her secretiveness in general.

3 Q. In addition to secretiveness about the cell
4 phone, you said she was secretive about going out,
5 she would, like, go out and not tell you where she
6 was going?

7 A. Correct.

8 Q. You told that to the police, as well, right?

9 A. I believe that we did.

10 Q. And in addition to the number of text
11 messages, being secretive about her cell phone, going
12 away out of the house and not telling you where she
13 was going, you also told them that she was being
14 picked up down the street on the corner, somebody who
15 was connecting with her was not picking her up in the
16 driveway. Did you tell them that, as well?

17 A. I'm not sure.

18 Q. And in addition to all these things, you
19 also told them that there was a number of video or
20 pictures that you could tell had been exchanged
21 between your daughter and this number that you
22 believe was Eric Romig, correct?

23 A. I had that on the cell phone billing that I
24 showed them.

25 Q. So that was all the information that you

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1 reported to the police, it wasn't just the volume of
2 texts, it was all these things, correct?

3 A. I believe so.

4 MR. RUSSELL: I have no further
5 questions.

6 MR. COX: I have one more.

7 * * *

8 EXAMINATION

9 BY MR. COX:

10 Q. Ma'am, you testified that you learned a
11 great detail of -- about the case from testimony that
12 you heard at hearings. Did you ever hear testimony
13 about a -- I asked about this before, but I want to
14 ask you more directly -- did you ever in those
15 hearings or in testimony that you heard, hear about a
16 conversation between Mr. Hollenbach and Mr. Babb?

17 A. No, I don't believe so.

18 MR. COX: That's all I have. Thank
19 you.

20 (Concluded at 5:07 p.m.)

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I hereby certify that the evidence
and proceedings are contained fully and accurately in
the notes taken by me of the testimony of the within
witness who was duly sworn by me, and that this is a
correct transcript of the same.



Stacy D. Serba

Notary Public

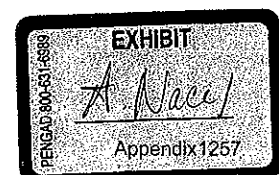
The foregoing certification does not apply to any
reproduction of the same by any means unless under
the direct control and/or supervision of the
certifying reporter.

Your Honorable Judge,

When I first found out the name of whose phone number was texting my daughter, I was astonished. I spent 2 days agonizing over what could be happening & what I should do. My first thoughts were – if I'm wrong, I could be ruining his life. Do I have the right to do this just so I know what's going on? After counting the 1000's of texts (sometimes 400 a day) & how many months it had been happening, I knew I had no choice in this matter. Knowing what to do & still finding the courage to approach my husband with my findings was even more difficult. I was extremely apprehensive over what he would say or do when learning of this. He agreed with me to go to the police & turn everything over to them. After I picked up our daughter from softball practice, we confronted her with our questions. At first we got denial & anger, followed quickly by tears & concern. All the while she was texting him to tell him we knew about them. At this point we took away her phone for good.

I have never been so afraid in my life. Some of my worst fears became real. I had no idea if she would be despondent enough to commit suicide. Or if she would try to run away with him & we would never see her again.

After hours of crying (the first time we ever saw her cry) & sobbing, she did not want to be alone so we held each other. We eventually laid in our king size bed, all 3 of us, holding on to each other for the rest of the night. None of us got any sleep, but we dozed on & off as she continued to cry. I was afraid to let her out



of my sight. She needed our support & love if she was going to come through this. This went on for the first week or two, even after going back to school.

The first few days, I felt so numb & sick to my stomach. I didn't eat but once a day when I forced down a sandwich or a bowl of oatmeal. I had severe headaches & pains all over, likely from the not eating & all the stress. I soon realized that my husband & daughter were in worse shape than me. They needed me so I pushed myself to go on. I missed more time from work than I ever have in 35 years with the company. I took time off for my husband & daughter to care for them. I took my daughter to the doctor because she was sick & had stopped eating also. I took her to NOVA & another doctor for a gyn exam, & another site for pregnancy & HIV tests. (A month later I found out they were negative – WOW what a relief.)

After 3 days (Fri – Sun), my husband was still traumatized, so I took him to the doctor. His doctor put him on medical leave from work for 2 weeks. He was put on medication to help him sleep & cope. He is still on the medication to this day, but not as high a dose. He told his doctor but no one else. He went back to work after 2 weeks. We found out later his medical leave & pay were denied by his insurance company. He then applied for family leave through FMLA but was turned down for that also. His doctor supplied more statements but the appeal was again denied. At this point we turned to his HR director at work & informed her of the circumstances & also informed his insurance company. Our final appeal was granted & the denial was overturned. His sick pay for

those 2 weeks was approved. One small victory & one less worry for me.

While my husband was home & on the medication (3 times a day), he was a zombie. There were few times when he was coherent. He never left the house except for a doctor appt. or took calls from anyone. He pulled the shades & kept the tv muted.

My husband has had other medical problems with his heart. He takes medicine daily for heart condition, high blood pressure, high cholesterol, etc. for many years now. I worry because he doesn't want anyone to know about this, nor will he talk about it. I do not have a problem talking about it. I feel the more that know , the better & the safer our daughter will be in case anything should happen. I feel like they will watch over her if I can't be there for some reason.

My husband was always extremely active with our daughter & softball. He will still act as her catcher during pitching lessons, but that is all. He no longer wants to come watch any of her games (travel or school), while before he rarely missed any if at all.

My husband & I had a date night every Fri. night for the last year or more. When this happened, those stopped. Four months later, I finally got him to go back out with me again. New rules – we couldn't go to our “normal” date place, or anywhere else we might know someone. This stopped again after the hearing in Jan. A few weeks ago he agreed to start going out again & we have gone out the last 2 weeks, yeah! But still not to our usual place or anywhere else we've been to twice. Small step forward though.

I feel like we are getting some of our life back to normal, but I am afraid of what will happen to us after sentencing. I am waiting for the other shoe to drop & more bad things to happen.

I have gone to every court hearing no matter how small or if I needed to. I want to be able to hear & see & try to understand what is happening. I do not trust others to tell me anything. I don't trust him not to try to pull something if I am not there. I know I need to be strong for my husband & daughter & I won't let them down. I feel like my life is on hold, like I'm running in quicksand (getting no where but sinking fast). I can't let that happen. My brain feels like it has stopped functioning. Before, I could multi - task with ease. Now simple things take longer to get done (reading email, bills, making decisions). I find it difficult to concentrate on one thing or even finish my thoughts. (Don't even ask how long this took to write.) I cannot focus on one thing for very long. I have to stop & regroup to be able to finish. I was always known to friends, family, & coworkers, as the problem solver. Give me a problem & I'll think outside the box until I fix or solve it. Now everything is a problem to me & it takes too much effort to think things through. I cannot even think about taking on new tasks, it's too hard. Is my brain injured? Why can't I think & cope? I hate being like this, I want my old brain back. I want to function normally again. I don't think I will be able to do that until well after sentencing. I hope the sentence is long enough to give our family time to heal & move on with our lives. I want my daughter to be able to go to college & play softball. I don't want to worry about him getting out of jail & seeing her or contacting her.

I find myself not trusting anyone, whether it's a friend, coworker, people from church, or even those involved with this case. I have the need to find things out myself (hard since I'm not a detective or have their resources) so that I know what is going on. His violation of my trust has blown me away. I spent time with him keeping the scorebook for the team. I feel so stupid for never noticing anything. I am very disturbed at how easily he duped my daughter & all of the other girls & the families. It is very hard to live my life without trust. I am distrustful of how "cooperative" he has been & what exactly his reasons are. I feel like he is trying to manipulate everyone around him to make this appear to be less awful.

The first month or two, I had chest pains often. Finally I discovered that they weren't a heart or health problem, but intense heartache of watching my daughter struggle. Her heart was broken & all that she knew ripped to pieces. It was like seeing an addict go through withdrawal. She had been so brainwashed by everything he had told her for so long. She appears to be handling things better now. But I worry about her view of things. I have seen signs of distrust & uncomfortableness with adult males since this has happened. She prefers not to talk about it & would like if people didn't know. She is aware that some do, but it is not brought up. She has confided in one or two of her closest friends I do know.

In the beginning, the school called almost daily to let me know if something was going on. They told me the girls were supportive. A few days in, the mood changed. The school then said they were concerned for her safety & wanted to pull her out of school. I had to weigh whether she was in actual danger vs leaving